

LOWENSTEIN SANDLER PC  
Michael S. Etkin  
Ira M. Levee  
1251 Avenue of the Americas, 18th Floor  
New York, New York 10020  
212. 262.6700 (Telephone)  
212. 262.7402 (Facsimile)

-- and --

65 Livingston Avenue  
Roseland, New Jersey 07068  
973.597.2500 (Telephone)  
973.597.2400 (Facsimile)

*Bankruptcy Counsel to Lead Plaintiffs and the MBS Class*

**IN THE UNITED STATES BANKRUPTCY  
THE SOUTHERN DISTRICT OF NEW YORK**

In re:	Chapter 11
LEHMAN BROTHERS HOLDINGS, INC., <i>et al.</i> ,	Case No. 08-13555 (JMP) (Jointly Administered)
Debtors.	Re: Doc. No. 19627

**NOTICE OF WITHDRAWAL OF LIMITED OBJECTION OF MBS LITIGATION  
LEAD PLAINTIFFS TO THIRD AMENDED  
JOINT CHAPTER 11 PLAN OF LEHMAN BROTHERS  
AND ITS AFFILIATED DEBTORS**

The Local 302 and 612 of the International Union of Operating Engineers–Employers Construction Industry Retirement Trust, the court-appointed lead plaintiff (the “Lead Plaintiff”) in the consolidated securities class action pending in the United States District Court for the Southern District of New York (the “District Court”) entitled *In re Lehman Brothers Mortgage Backed Securities Litigation*, Case No. 08-6762 (LAK) (the “MBS Litigation”),<sup>1</sup> by and through

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<sup>1</sup> By order of the Judicial Panel on Multidistrict Litigation, the MBS Litigation was consolidated with a number of other federal actions against Lehman Brothers Holdings, Inc. and other defendants under the caption *In re Lehman Brothers Securities and ERISA Litigation*, Master Case No. 09-MD-2017 (LAK).

its undersigned counsel, previously filed a limited objection (the “Limited Objection”)<sup>2</sup> to confirmation of the Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings, Inc. and its Affiliated Debtors. Based upon certain changes set forth in the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings, Inc. and its Affiliated Debtors attached to the Debtors’ Response to Objections to Confirmation, as well as language contained in the proposed Confirmation Order, Lead Plaintiff hereby withdraws the Limited Objection.

Dated: December 5, 2011  
New York, New York

Respectfully submitted,

**LOWENSTEIN SANDLER PC**

By: /s/ Michael S. Etkin  
Michael S. Etkin (ME 0570)  
Ira M. Levee (IL 9958)  
1251 Avenue of the Americas, 18th Floor  
New York, New York 10022

-- and --

65 Livingston Avenue  
Roseland, New Jersey 07068  
973.597.2500 (Telephone)  
973.597.2400 (Facsimile)

*Bankruptcy Counsel to Lead Plaintiffs and the MBS Class*

-- and --

**COHEN MILSTEIN SELLERS & TOLL PLLC**

Joel P. Laitman  
Christopher Lometti  
Daniel B. Rehns  
88 Pine Street, 14<sup>th</sup> Floor  
New York, New York 10005  
212.838.7797 (Telephone)  
212.838.7745 (Facsimile)

*Lead Counsel for Lead Plaintiff and the MBS Class*

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<sup>2</sup> Capitalized terms used herein and not otherwise defined shall have the meaning ascribed in the Limited Objection.